

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **BK. No. 15-14288 ELF**  
**HUNTER D. WILLIAMS** :  
: **Debtor** : **Chapter No. 13**  
:

**WELLS FARGO BANK, NA**

**Movant**

**v.**

**HUNTER D. WILLIAMS**

**CARRIE S. WILLIAMS (NON-FILING CO-  
DEBTOR)**

**Respondents**

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO  
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **WELLS FARGO BANK, N.A.**. The property address is 4 ANTHONY DRIVE, MALVERN, PA 19355, Loan # ending in 7452. A Proof of Claim has/has not been filed on the claim register at #3. A written Notice of Payment Change/Forbearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b) and Local Rule 20-3007.
2. The terms of the forbearance are as follows: Regular monthly mortgage payments starting with the April 1, 2020 through June 30, 2020 are suspended. Payment of the escrow component of the regular monthly mortgage payments (shall also be suspended).
3. The Creditor advises that no fees will be assessed against the loan with regard to this Notice of Forbearance.

4. Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.
5. Creditor, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$2,884.21.
6. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Mario J. Hanyon, Esquire

Mario J. Hanyon, Esq., Id. No.203993

Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31340

Fax Number: 215-568-7616

Email: mario.hanyon@phelanhallinan.com

May 14, 2020

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**BK. No. 15-14288 ELF**

**HUNTER D. WILLIAMS**

**Debtor**

**Chapter No. 13**

**WELLS FARGO BANK, NA**

**Movant**

**v.**

**HUNTER D. WILLIAMS**

**CARRIE S. WILLIAMS (NON-FILING CO-  
DEBTOR)**

**Respondents**

**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 14, 2020.

WILLIAM C MILLER, ESQUIRE (TRUSTEE)  
P.O. BOX 1229  
PHILADELPHIA, PA 19105

CARRIE S. WILLIAMS  
4 ANTHONY DRIVE  
MALVERN, PA 19355

RICHARD N. LIPOW, ESQUIRE  
LIPOW LAW OFFICE, 629 SWEDES FORD  
ROAD  
MALVERN, PA 19355

HUNTER D. WILLIAMS  
4 ANTHONY DRIVE  
MALVERN, PA 19355

UNITED STATES TRUSTEE  
OFFICE OF THE U.S. TRUSTEE  
200 CHESTNUT STREET  
SUITE 502  
PHILADELPHIA, PA 19106

/s/ Mario J. Hanyon, Esquire

Mario J. Hanyon, Esq., Id. No.203993  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31340

May 14, 2020

Fax Number: 215-568-7616

Email: [mario.hanyon@phelanhallinan.com](mailto:mario.hanyon@phelanhallinan.com)

Exhibit “A”